

Appl. No. 10/052,068  
Amtd. Dated 11/12/2004  
Reply to Office action of 8/12/2004

### REMARKS/ARGUMENTS

Examiner Wang and Primary Examiner Brier are thanked for the courtesy of a telephonic interview that took place on Monday, November 15, 2004. Applicant respectfully submits that the following remarks set forth herein reflect the substance the arguments presented by the Applicant to Examiner Wang and Primary Examiner Brier.

Applicant is pleased that with the amendments incorporated into independent claim 12 that, Examiner Wang and primary Examiner Brier (hereinafter Examiners), indicated that amended independent claim 12 should overcome the rejections cited in the previous Office Action and should be allowable.

Applicant has also added independent claims 64 and 68, which contain the same limitations as amended independent claim 12, along with further limitations, and therefore should be patentable for at least the same reasons. Additionally, Applicant has added dependent claims that are dependent from the independent claims which should also therefore be patentable.

Additionally, as to the drawing objection in Figure 1A, in which the Examiner stated that the display should be referenced by the numeral 35, a corrected drawing is submitted herewith in the Appendix.

Applicant respectfully submits that the following arguments reflect the substance of the arguments set forth by the Applicant and agreed to by the Examiners as to why independent claims 12, 64, and 68 should be patentable.

Original Independent claim 12 stood rejected under 35 U.S.C. §102(b) as being allegedly anticipated by Y. Watanabe and Y. Suenaga, "A trigonal prism-based method for hair image generation", IEEE Computer Graphics and Applications, 17(3), May 1997, p. 47-53. (hereinafter Watanabe).

To begin with, as to the primary reference, Watanabe, Watanabe is directed to a method using a triagonal prism to model human hair.

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In contrast, Applicant's amended independent claims are directed to *a method for generating fur.*

As discussed with the Examiners, there is no teaching or suggestion in Watanabe for: producing a plurality of hairs representative of *a coat of fur*...Identifying a hair of a plurality of hairs of the area as a *clump-center hair*...Identifying an area size...*Indicating clump area parameters including clump-density, clump-size, and clump-percent*...Determining hairs of a plurality of hairs that are within the area as clump area hairs...The area located according to the clump-center hair and area size...*Orienting the clump area hairs according to the clump area parameters including clump-density, clump-size, and clump-percent*...and dynamically varying the clump area parameters including clump-density, clump-size, and clump-percent to make the fur appear increasingly wet and to provide a variety of dry-to-wet fur appearances.

Likewise, the Gelder reference does not teach or suggest these above-identified claim limitations either.

Further, as previously discussed, Watanabe is directed to creating long human hair not fur. Moreover, Gelder is not combinable with Watanabe because as stated in Gelder, Gelder relates to a technique for modeling fur, but not long human hair. This is exactly the opposite of Watanabe. Thus, Gelder, teaches away from a combination with Watanabe.

Neither Watanabe nor Gelder teaches or suggests Applicant's novel and non-obvious method of generating fur by determining hairs of a plurality of hairs within an area as clump area hairs...The area located according to the *clump-center hair and area size*...and *orienting clump area hairs according to clump parameters including clump-density, clump-size, and clump-percent*.

Quite clearly, the methods and processes taught by Watanabe and Gelder are quite different than that of the embodiments of Applicant's amended independent claims.

Also, as noted by the previous Office Action, and as noted by the Examiners in the interview, neither Watanabe nor Gelder disclose dynamically varying clump area parameters

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including clump-density, clump-size, and clump-percent to make fur appear increasingly wet and to provide a variety of dry-to-wet fur appearances.

As discussed with the Examiners, Anderson does not teach these limitations. In fact Applicant searched Anderson and could find no specific teaching or suggestion of utilizing clump-parameters to make fur appear increasingly wet and to provide a variety of dry-to-wet fur appearances.

As discussed with the Examiners, the only reference that Applicant could find that remotely related to changing the color and/or other hair parameters of a hair is cited in column 7 of Anderson which states that: preferably, in a color system, opacity values also reflect the color and/or other hair parameters of each hair...For example, the opacity of a blond hair which covers ten percent of a pixel may be modeled by a numeric value equal to ten percent of the value of the completely blond pixel...In this way, it is possible to generate an overall opacity value for each pixel by summing together the opacity values contributed by each hair whose projection intercepts the pixel.

As discussed with the Examiners, Anderson does not teach or suggest nor does Watanabe and/or Gelder teach or suggest Applicant's amended independent claim limitations related to *dynamically varying the clump area parameters including clump-density, clump-size, and clump-percent to make fur appear increasingly wet and to provide a variety of dry-to-wet fur appearances.*

There is quite simply no teaching or suggestion in the references to teach or suggest Applicant's amended independent claim 12 or the newly presented claims. This is because Watanabe, Gelder, and Anderson utilize totally different techniques to render hair and in fact could not utilize the types of parameters as set forth in Applicant's claims.

As agreed to with the Examiners, Applicant respectfully submits that amended independent claim 12, as well as new independent claims 64 and 68, are clearly patentable over the prior art of record. Thus, Applicant respectfully submits that amended independent claim 12,

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as well as all the other newly presented claims, are in condition for allowance, and such action is earnestly solicited at the earliest possible date.

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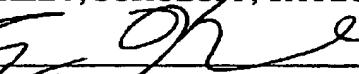
***Conclusion***

In view of the remarks made above, it is respectfully submitted that pending claims 12 and 65-75 define the subject invention over the prior art of record. Thus, Applicant respectfully submits that all the pending claims are in condition for allowance, and such action is earnestly solicited at the earliest possible date. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application. To the extent necessary, a petition for an extension of time under 37 C.F.R. is hereby made. Please charge any shortage in fees in connection with the filing of this paper, including extension of time fees, to Deposit Account 02-2666 and please credit any excess fees to such account.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 11/12/2004

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**Attachments**

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Nicole P. Erquinga

11/12/2004

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